

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
FOURTH DIVISION  
**Criminal No. 20-CR-167 (NEB/TNL)**

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UNITED STATES OF AMERICA, )  
vs. )  
Gage Anthony Norris, )  
Defendant. )

Plaintiff, ) **MOTION TO SUPPRESS THE**  
 ) **SEARCH AND SEIZURE**

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The defendant, Gage Norris, by his attorney, Ryan Pacyga, and in accordance with his Fourth Amendment protections, hereby moves the Court to suppress the search and seizure of evidence as follows:

Pursuant to Fed. R. Evid. 12(b)(3)(C), Mr. Norris, by and through counsel, hereby moves the Court for an order suppressing the firearm. The grounds for the motion are that law enforcement lacked reasonable articulable suspicion or probable cause to seize the defendant by initiating a traffic stop, and that the warrantless search of the car and seizure of the firearm violated his rights as guaranteed by the Fourth Amendment to the United States Constitution. *Coolidge v. New Hampshire*, 403 U.S. 443, 454-55 (1971) (warrantless searches and seizures are per se unconstitutional, subject to established exceptions); *Vale v. Louisiana*, 399 U.S. 30, 34 (1970) (Government has the burden of proving that an exception applies).

This motion is based on arguments of counsel, evidence adduced at the motions hearing, and all other matters of record herein.

Respectfully submitted,

RYAN PACYGA CRIMINAL DEFENSE

Dated: September 15, 2020.

By: /s/ Ryan M. Pacyga  
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